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Of Attorneys for Sunshine Dairy Foods Management, LLC  
Debtors-in-Possession

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Of Attorneys for Karamanos Holdings, Inc.,  
Debtor-in-Possession

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON

In re

Sunshine Dairy Foods Management, LLC  
and  
Karamanos Holdings, Inc.,

Debtors-in-Possession.

Bankruptcy Case Nos.

18-31644-pcm11 (Lead Case)

18-31646-pcm11

DEBTOR'S SECOND MOTION TO  
EXTEND DEADLINE TO FILE 2015  
REPORT FOR OCTOBER

Debtor-in-Possession, Sunshine Dairy Foods Management, LLC ("Debtor") moves the Court for an order extending the deadline of December 5, 2018 to file Debtor's 2015 Report for October 2018 to December 12, 2018. This extension is necessary based on the following:

1. Debtor's bookkeeper became ill shortly after her return from her vacation/honeymoon and the employee that was assisting the bookkeeper was out of the office on prearranged vacation. October's report also needs to incorporate recently updated information on the additional amounts unpaid to professionals and include additional sums owed on recently incurred debt.

2. Extending the 2015 Report deadline from December 5, 2018 through and including December 12, 2018 will not prejudice any of the other parties in this case. Creditors will not be prejudiced by the delay by receiving the financial reporting for October 2018 on December 12, 2018 rather than on December 5, 2018.

WHEREFORE, Debtor's Motion to Extend Time should be granted, and the Debtor permitted until December 12, 2018 to file its October 2015 Report.

VANDEN BOS & CHAPMAN, LLP

By: /s/Christopher N. Coyle  
Douglas R. Ricks, OSB #044026  
Christopher N. Coyle, OSB #073501  
Of Attorneys for Debtor-in-Possession  
Sunshine Dairy Foods Management, LLC

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON

In re

Sunshine Dairy Foods Management, LLC  
and  
Karamanos Holdings, Inc.

Debtors-in-Possession.

Bankruptcy Case Nos.

18-31644-pcm11 (Lead Case)

18-31646-pcm11

**[PROPOSED]** ORDER GRANTING  
EXTENSION OF TIME TO FILE DEBTOR'S  
2015 REPORT FOR OCTOBER

Based on Debtor-in-Possession's, Sunshine Dairy Foods Management, LLC  
("Debtor"), Second Motion to extend the time to file Debtor's 2015 Report for October 2018,  
it is

ORDERED that the time within which the Debtor must file Debtor's 2015 Report for  
the month of October 2018 is extended through and including December 12, 2018.

###

PRESENTED BY:

VANDEN BOS & CHAPMAN, LLP

By: /s/Christopher N. Coyle  
Douglas R. Ricks, OSB #044026  
Christopher N. Coyle, OSB #073501  
Of Attorneys for Sunshine

**CERTIFICATION:** I certify that I have complied with the requirements of LBR 9021-1(a); the proposed form of order was served with the motion.

By: /s/Christopher N. Coyle  
Douglas R. Ricks, OSB #044026  
Christopher N. Coyle, OSB #073501  
Of Attorneys for Sunshine

**First Class Mail:**

Sunshine Dairy Foods Management, LLC  
c/o Daniel Boverman, CRO  
11285 SW Walker Rd.  
Portland, OR 97225

Karamanos Holdings, Inc.  
c/o Daniel Boverman, CRO  
11285 SW Walker Rd.  
Portland, OR 97225

Scott Laboratories Inc.  
Attn: Jill Skoff, Accting Assistant  
PO Box 4559  
Petaluma, CA 94955

Valley Falls Farm, LLC  
c/o Bryan P. Coluccio, V.P. and  
General Counsel Keystone-Pacific, LLC  
18555 SW Teton Avenue  
Tualatin, OR 97062  
(Un. Sec. Cred. Comm. Chairperson)

Sorrento Lactalis, Inc.  
c/o Phillips Lytle LLP  
Attn: Angela Z. Miller  
125 Main Street  
Buffalo, NY 14203

**Electronic Mail:**

The foregoing was served on all CM/ECF participants through the Court's Case Management/Electronic Case File system.

In re Sunshine Dairy Foods Management, LLC  
Ch 11 Bankruptcy Case No. 18-31644-pcm11(Lead Case)  
In re Karamanos Holdings, Inc.;  
Ch 11 Bankruptcy Case No. 18-31646-pcm11

CERTIFICATE - TRUE COPY

DATE: December 5, 2018

DOCUMENT: DEBTOR'S SECOND MOTION TO EXTEND DEADLINE TO FILE 2015  
REPORT FOR OCTOBER

[PROPOSED] ORDER GRANTING EXTENSION OF TIME TO FILE  
DEBTOR'S 2015 REPORT FOR OCTOBER

I hereby certify that I prepared the foregoing copy of the foregoing named  
document and have carefully compared the same with the original thereof and it is a  
correct copy therefrom and of the whole thereof.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing on:

Sunshine Dairy Foods  
Management, LLC  
c/o Daniel Boverman, CRO  
11285 SW Walker Rd.  
Portland, OR 97225

Valley Falls Farm, LLC  
c/o Bryan P. Coluccio, V.P. and  
General Counsel Keystone-Pacific, LLC  
18555 SW Teton Avenue  
Tualatin, OR 97062  
(Un. Sec. Cred. Comm. Chairperson)

Sorrento Lactalis, Inc.  
c/o Phillips Lytle LLP  
Attn: Angela Z. Miller  
125 Main Street  
Buffalo, NY 14203

Karamanos Holdings, Inc.  
c/o Daniel Boverman, CRO  
11285 SW Walker Rd.  
Portland, OR 97225

Scott Laboratories Inc.  
Attn: Jill Skoff, Accting Assistant  
PO Box 4559  
Petaluma, CA 94955

by mailing a copy of the above-named document to each of them in a sealed envelope,  
addressed to each of them at his or her last known address. Said envelopes were  
deposited in the Post Office at Portland, Oregon, on the above date, postage prepaid.

I hereby certify that the foregoing was served on all CM/ECF participants through  
the Court's Case Management/Electronic Case File system on the date set forth below.

Dated: December 5, 2018

VANDEN BOS & CHAPMAN, LLP

By: /s/Christopher N. Coyle  
Douglas R. Ricks, OSB #044026  
Christopher N. Coyle, OSB #073501  
Of Attorneys for Sunshine Dairy Foods  
Management, LLC